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*Attorney for Defendants*  
*Reinier Hoogenraad and Benjamin Montgomery*

7 **UNITED STATES DISTRICT COURT**  
8  
9 **DISTRICT OF NEVADA**

10 MIROSLAV KEFURT, derivatively on  
11 behalf of BREMACH, INC., a Nevada  
Corporation,

12 Plaintiff,

13 vs.

14 REINIER “RAY” HOOGENRAAD, an  
15 Individual, BENJAMIN “BEN”  
MONTGOMERY, an Individual,

16 Defendants.

17 BREMACH, INC., a Nevada Corporation.  
Nominal Defendant.

CASE NO.: 2:22-cv-01774-JAD-BNW

**STIPULATION AND ORDER TO  
EXTEND BRIEFING SCHEDULE**

ECF No. 29

20 COME NOW, MIROSLAV KEFURT (“Plaintiff”), by and through his counsel Leah  
21 Martin Law, and REINIER HOOGENRAAD, and BENJAMIN MONTOGOMERY (collectively  
22 “Defendants” and together with Plaintiff, the “Parties”), by and through their counsel John W.  
23 Thomson, Esq., of Thomson Law PC, hereby stipulate and agree to extend the briefing schedule  
24 on Plaintiff’s Motion to Unfreeze the US Bank Account for Bremach, Inc., filed on October 12,  
25 2023.

1 WHEREAS, Plaintiff filed a Motion to Unfreeze the US Bank Account for Bremach, Inc.,  
2 on October 12, 2023.

3 WHEREAS, Defendants have a response due to the Motion on October 26, 2023.

4 WHEREAS, Defendants have recently retained Thomson Law PC to represent them in  
5 the instant matter.  
6

7 Good cause exists for this extension as counsel for Defendants has just been retained and  
8 requires time to become knowledgeable about the case to prepare a responsive pleading; and the  
9 Parties are working through discovery issues.

10 NOW THEREFORE, through their respective undersigned counsel,

11 IT IS HEREBY STIPULATED that the following deadlines shall be changed as follows:

12 Defendant's Deadline to file a responsive brief shall be changed from October 26, 2023  
13 to November 27, 2023.

14 IT IS SO STIPULATED.  
15

16 DATED THIS 25th day of October 2023.  
17

18 **THOMSON LAW PC**

19 */s/ John W. Thomson, Esq.*  
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22 **O'HARA & GRECO, A Law Corporation**

23   
24 THOMAS A. GRECO, ESQ.,  
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25 25361 Commercentre Drive, Suite 150  
Lake Forest, California 92630  
26 *Attorney for Defendants*

27 **LEAH MARTIN LAW**

28 */s/ Kevin Hejmanowski, Esq.*  
Kevin Hejmanowski, Esq.,  
Nevada Bar No. 10612  
Leah Martin, Esq.,  
601 W. South Rancho Drive, Suite C-26  
Las Vegas, NV 89106  
702-420-2733  
*Attorneys for Plaintiff*

**ORDER:**

Based on the parties' stipulation [ECF No. 29] and good cause appearing, **IT IS ORDERED** that defendant has until November 27, 2023, to respond to [ECF No. 28] Plaintiff's Motion to Unfreeze the US Bank Account for Bremach, Inc.

U.S. District Judge Jennifer A. Dorsey  
October 26, 2023